
File Code: 1570
Date: August 31, 2020

Arian Pregenzer
13013 Arroyo de Vista NE
Albuquerque, NM 87111

**CERTIFIED MAIL –
RETURN RECEIPT REQUESTED**

Dear Dr. Pregenzer:

On behalf of the Cibola National Forest, I would like to thank you for your time talking with me and your involvement in the Military Training Exercises within the Cibola National Forest Project in the Magdalena, Mountainair, Sandia, and Mt. Taylor Ranger Districts. This letter is in response to the objection you filed on the final Environmental Assessment (EA) and draft Decision Notice (DN). I have read and considered your objection, considered our conversation, and reviewed the project record and final EA, including the environmental effects. My review of your objection was conducted in accordance with the administrative review procedures found at 36 CFR 218, Subparts A and B.

PROJECT OVERVIEW

This project would renew the existing special use permit (SUP) to continue to conduct military training exercises, with limited increases in specific types of training, in the Cibola National Forest. Three groups currently train under the existing SUP in the Cibola National Forest: the United States Air Force (USAF) 351 Special Warfare Training Squadron (351 SWTS); the USAF 58th Special Operations Wing (58 SOW); and, the United States Marine Corps 4th Reconnaissance Battalion (4th Recon). Variability in terrain and landscape settings is essential to ensure realistic, real world training for the units. The USAF has trained in portions of the Cibola National Forest since the 1970s, under various special use permits, conforming to the 1988 *Master Agreement between the Department of Defense and the Department of Agriculture Concerning the Use of National Forest System Lands for Military Activity*. This agreement directs USDA's Forest Service to make lands available for military training activities when such activities can be made compatible with other uses and conform with forest land management plans, provided the Department of Defense (DOD) determines that lands under its administration are unsuitable or unavailable.

ADMINISTRATIVE REVIEW PROCESS

The legal notice for the objection filing period was published on May 31, 2020. Your timely objection (objection #20-03-00-0024-O218) was received on July 13, 2020. The regulations at 36 CFR 218 provides a pre-decisional administrative review process, in which the objector



provides sufficient narrative description of the project, specific issues related to the project, and suggested remedies that would resolve the objections (36 CFR 218.8). The regulations also allow for parties to meet in order to resolve issues. An objection resolution meeting to further discuss your concerns was held on August 20, 2020. This letter, including instructions to the Responsible Official, is my written response to your objections.

OBJECTION RESPONSES

Issues or concerns presented in your objection are summarized and responded to below. You may be addressed as "the objector" in this section.

Contention: The final EA and draft Decision fail to represent the full scope and depth of public involvement and concern. The draft Decision and final EA do not meaningfully address comments and concerns and there has been only cursory change between the draft EA in 2013 and the final EA published in May 2020. The Decision fails to take into account that only five commenters supported the military training in the Cibola National Forest, in contrast with 142 commenters in opposition or requesting significant change. None of these changes were made, nor were reasons given for ignoring them. The objector contends responses in Appendix A are cursory, inaccurate, and not supported in the text of the final EA in many cases. (Objection, p. 1-3)

Response: Council of Environmental Quality (CEQ) regulations state that agencies must consider comments and can modify alternatives, develop new alternatives, supplement or improve the analysis, make corrections, or explain why the comments do not warrant further agency response (40 CFR 1503.4). The CEQ regulations also require that agencies consider comments through review processes and use them in making decisions (40 CFR 1505.1(c), (d)). Agency regulations also require the responsible official consider comments (36 CFR 220.4 (c)).

The draft DN is based on the results and findings of the final EA, consideration of public comments, and review of the 1985 Land and Resource Management Plan [PR 365, p. 1]. It summarizes the project's public involvement, which included two 30-day comment periods that took place in 2013 and 2014 [PR 365, p. 4-5].

Though not required with an EA, a response to comments document was compiled. The Response to Comments contains 63 pages of concerns and comments brought forward during the two 30-day comment periods and the November 2013 public meeting and the responses [PR 366, Appendix A]. The section entitled "Changes since Issuance of the Draft EA" summarizes some changes in response to public comment [PR 366, p. 1-5].

I heard your concern during the call that the character or tone of the comments was not included in the EA. However, with the inclusion of the Response to Comments document as Appendix A to the EA, it is possible for a reader to make their own interpretation of the intent of the comment, as well as see how it was considered. As we discussed, no one person's comments are given greater weight than another person's comments.

Contention: The objector contends the final EA does not include a range of reasonable alternatives. The EA did not consider alternatives that minimized the impact on sensitive

riparian areas, provide a buffer around private property, or that reduce the numbers and levels of training exercises taking place in the Forest. The objector contends the EA failed to evaluate the use of military land for this training, and the assertion in the USAF draft Decision that there is no practical alternative to using the Cibola National Forest for training is unsupported by analysis or data. The statement that No-Fly Zones will be established over private inholdings is false, as demonstrated in Figure 3.2.2-1 on page 3-20 which shows flight paths directly over the objector's property and other inholdings. Military vehicles are not excluded from riparian areas, and despite requests from landowners, there is no alternative that includes a buffer around most inholdings. Existing Tactics and Training and Field Training Exercise areas should be moved so they do not include private property. (Objection, p. 5-6, 12-14). Vehicle traffic on roads not designated as official National Forest System roads (including tracks off 354) should cease. (Objection, p. 12)

Response: Forest Service regulations state that an alternative should meet the project's purpose and need and address one or more significant issues related to the proposed action (36 CFR 220.5(e)).

In order to effectively train for situations that may be encountered in deployment, the USAF needs the flexibility to design training programs that include diverse terrain and operational situations. The Response to Comments explains that military lands were analyzed per a Master Agreement between the Department of Agriculture and the DOD. The military sites within New Mexico and nearby states were found to be incompatible with the proposed training [PR 366, pp. A-24 and A-25].

The airspace over the Cibola National Forest is an uncontrolled airspace, and decisions around activities in an uncontrolled airspace are governed by the Federal Aviation Administration (FAA). The final EA includes the information that the Air Force will consider establishment of No-Fly Zones over private property if the request is submitted in writing to Kirtland Public Affairs [PR 366, p. 2-28]. The final EA also includes the incorrect information that No-Fly Zones will be established over all private inholdings within the boundaries of the Cibola National Forest [PR 366, p. 2-28 #4]. The activities in an uncontrolled airspace are not within the authority of the Forest Service, and this design criteria will be removed from the final EA. As the objector noted, No-Fly Zones are not reflected in the analysis. USDA's Forest Service's decision to be made is whether to renew the existing SUP and update the training needs of the military. The decision would issue a SUP for the activities requested by the DOD that would take place on the ground within National Forest System lands.

The variety of terrain and landscape ensures realistic training [PR 366, p. 1-2]. Alternatives considered include a No Action alternative under which authorizations would not be issued and no training would occur; the Proposed Action, under which renews the authorizations and increases types of training within the Cibola National Forest as requested by the military; and, Alternative 1, under which would renew the authorization to continue the current training levels [PR 366, pp. 2-1 to 2-14]. Only the Proposed Action meets the purpose and need of the project. USDA's Forest Service multiple-use mandate does not exclude use of Forest Service System lands adjacent to lands with a different ownership. However, the EA displays a map on intended activities that shows a one-quarter mile buffer around your private property [PR 366, p. 2-7].

Another suggested alternative noted in the Response to Comments would minimize impacts on roadless areas, riparian areas, wildlife, livestock, and humans. The Operating Plan that will accompany the authorization to allow training on the Forest states that military activities will avoid these kinds of areas [PR 366, p. A-32]. In response to a question whether all reasonable alternatives have been considered, the Response to Comments states that all reasonable alternatives were considered [PR 366, p. A-32].

Contention: The final EA does not adequately assess impacts of training on wildlife and humans and fails to provide convincing rationale for not conducting analysis with an EIS. (Objection, p. 8)

The draft DN mentions effects on the health and safety of students and pilots, but does not analyze the effects of chronic noise exposure on residents and wildlife or address the documented significant effects on local residents. Figures 3.3.2-1 – 3.3.2-5 showing noise contours for each helicopter drop zone do not have sufficient detail for public evaluation. In addition, there is insufficient information about the locations of base camps to evaluate the accuracy of the environmental assessment. (Objection, p. 8). The description of base camps is vague. The PJ/CRO training has moved its basecamp within sight of my residence for the last several years and prior to final analysis and decision. The objector has never been contacted to discuss minimizing the impacts of this basecamp. (Objection, p. 14)

Analysis of the effects to wildlife is incomplete, inaccurate, or contradictory. There is inadequate discussion of the impacts of noise on wildlife, and the statements about habituation of elk and deer to noise is based upon outdated research, mostly from the 1980s and 1990s. The Forest Supervisor's conclusion that construction of three new helicopter landing zones (HLZs) will have no significant impact on wildlife is contradicted by the USDA's Forest Service's own statements about the existing impacts due to HLZ-26. Objector also contends that the statement of no impact to banner tail kangaroo rats is contradicted by her personal experience of mounds flattened by military vehicles. (Objection, p. 8)

Response: According to CEQ, an EA should briefly provide sufficient evidence and analysis, including the environmental impacts of the proposed action and alternatives to determine whether to prepare an EIS or a finding of no significance (40 CFR 1508.9). Also, CEQ NEPA (National Environmental Policy Act) regulations explain that use of the term "significantly" requires considerations of both context and intensity. In considering intensity, agencies are to evaluate impacts that may be both beneficial and adverse (40 CFR 1408.27). According to the draft Decision Notice, the Responsible Official considered the analysis in the final EA, public comments, and the project record in selecting the proposed action for implementation [PR 365, p. 1]. The Finding of No Significant Impact (FONSI) documents the limited context and intensity of the proposed actions. The Responsible Official determined that the Proposed Action is not a major federal action and will not significantly affect the quality of the human environment, based on consideration of 10 intensity factors relative to the analysis in the EA [PR 365, pp. 5-7]. The military has been training in and around Magdalena on National Forest System Lands for 40 years, with very little effect.

Noise Exposure – The Response to Comments addresses the contention that the EA does not analyze the effects of noise exposure. Appendix C (with the addition of Response to comments as Appendix A in the final EA, this is now Appendix D) provides a summary of noise effects on

livestock and wildlife [PR 366, p. A-51]. The final EA analyzes noise effects and effects to wildlife in separate sections of Chapter 3 [PR 366, pp. 3-24 to 3-45 and 3-62 to 3-157, respectively]. Noise from aircraft training exercises at Magdalena are currently limited to one HLZ, whereas under the Proposed Action, training exercises would be spread out between the existing HLZ and three new HLZs, which means there would be less noise impacts at the existing HLZ [PR 366, p. 3-36 to 3-37]. The Biological Resources section analyzes several aspects of how training could affect various wildlife species, including whether the training activities would disrupt or remove habitat and whether high noise levels from munitions firing or aircraft noise would cause direct physiological changes [PR 366, p. 3-93]. This section also analyzes effects to various species by each training location. For Magdalena, the analysis includes HLZ-26; proposed HLZs X, Y, and Z; Cunningham Drop Zone and field training exercise locations; tactics training area; land navigation training area; and the existing base camp, as well as the other two proposed camp locations [PR 366, pp. 3-113 to 3-143]. This analysis indicates minimal impacts to all the species analyzed.

Base Camps - The Response to Comments explains that the USAF and USDA's Forest Service worked together to find locations for the proposed base camps near Magdalena in order to improve safety and communications [PR 366, p. A-30]. Alternate base camp locations have been assessed, in order to minimize impacts to landowners [PR 366, p. A-17]. The final EA contains maps at differing scales that show three potential base camp locations near Magdalena [PR 366, p. 2-3, 2-4] and these locations are described in subsequent pages in the final EA. A map that better clarifies the locations of the base camps will be included with the documents.

Banner Tail Kangaroo Rats Effects – The final EA's Biological Resources Environmental Consequences section states that this species likely has been displaced from the existing HLZ-26 because of high noise levels; however, this species was not observed during recent surveys [PR 366, pp. 3-117]. In response to the objector's concerns about the banner tail kangaroo rat, a design criterion was added to avoid banner tail kangaroo rat mounds on roads whenever possible [PR 366, p. A-59].

Contention: Objector contends the final EA presents inconsistent, inaccurate, and incomplete information about training activities, and cumulative effects analysis fails to consider the impacts of other military activity. Also, that the Forest Service has not independently evaluated the USAF claims of no significant adverse cumulative impacts.

Objector contends that neither the Forest Service nor the USAF have been able to provide an accurate description of existing and proposed military activity, nor what other military activities may be taking place in the Cibola National Forest, including permitted single day activities or additional land-based military training by other groups, despite requests for that information. The table at 3.2.2-2 presents conflicting data for the activity at four HLZs and the Cunningham Drop Zone. It would appear from the numbers given that sorties per average busy day increase by 18%, while sorties per average busy year increases by 30%.

Objector contends the final EA does not provide enough information about the additional aircraft activity to evaluate the cumulative impact of noise and disturbance on the area east of the Bear Mountains. (Objection, p. 9-11)

Response: Thank you for bringing the errors in tables to our attention. They have been corrected, and a track-changes set of tables is included with this letter so that you may see the corrections. As we discussed during the call, the correct numbers were used in the analysis, and the errors in the tables were missed in edits to the final EA.

According to Forest Service NEPA regulations, an EA shall briefly provide analysis to determine whether to prepare and EIS or FONSI, including direct, indirect, and cumulative impacts of the proposed action and alternatives (36 CFR 220.7). As noted in the Response to Comments, Chapter 4 of the EA addresses other activities in the proposed action area, including military activities [PR 366, p. A-20]. Chapter 4 of the final EA considers cumulative impacts to noise, air quality, Earth, biological, cultural, and water resources, as well as hazardous materials and wastes, ground and aircraft safety, bird-aircraft strike hazard, utilities and infrastructure, land use, recreation, and visual quality [PR 366, pp. 4-1 to 4-12]. Several additional military training activities in the state of New Mexico are described [PR 366, p. 4-1 to 4-2].

The Response to Comments also addresses the contention of inaccurate and incomplete information about training activities, noting that the EA discusses 14 environmental resources [PR 366, p. A-16]. The military does a lot of training around Magdalena and the draft EA did not describe the training clearly. The final EA was revised to better describe and explain the training activities. In 2014, the USAF hosted at least two meetings in the project area near Magdalena to further educate the public about their exercises.

Contention: The objector contends the Forest Service fails to describe a credible approach to monitoring military compliance with any requirements. Examples from the objector include trash from navigational aids, overflights of private residences, destruction of wildlife habitat (banner tail kangaroo rat) through off-road driving, and trespass on private property. Objector is also concerned about monitoring the number of sorties and events taking place. (Objection, p. 15-16)

Response: There is no requirement in the CEQ NEPA regulations to monitor. However, appropriate mitigation measures are required (40 CFR 1502.14). The Forest Service Planning Model, in Forest Service Handbook 1909.15, Chapter 10, shows that monitoring is part of project implementation (p.4). Most Forest Service environmental analyses, from Categorical Exclusions, through Environmental Assessments, and Environmental Impact Statements, contain varying levels of monitoring. Section 2.8 of the final EA was revised to comply with the guidance in a 2011 CEQ memo regarding monitoring [PR 366, p. A-47].

The Response to Comment document addresses monitoring in a general sense for special use authorizations, clarifying that all special use permit/authorization holders are monitored; every permit includes an operating plan to ensure compliance with the permit [PR 366, p. A-17]. The Operating Plan, which accompanies the special use authorization, would stipulate cleanup of garbage and debris, followed by a site inspection at the end of each training session [PR 366, p. A-30]. Design criteria common to the Proposed Action and Alternative 1 include cleanup of brass and empty smoke canisters, spent munitions, or trash [PR 366, p. 2-19]. Monitoring of the permit is under the responsibility of the special use program.

CONCLUSION

I have reviewed the project in light of the issues presented in the objection letter received and clarified in the objection resolution meeting. My review finds that the project is in compliance with all applicable laws and the Cibola National Forest Plan. However, based on my review, I am instructing Acting Forest Supervisor Matt Rau to:

- Correct the editing errors in numbers in tables.
- More fully acknowledge the nature and concerns of the public who have participated in the comment periods.
- Remove design criteria #4 on page 2-28 of the EA. This information is incorrect as the activities in uncontrolled airspace are not within the authority of the Forest Service.
- Provide clarifying language to specifically address effects to impacted roadless area characteristics relative to the FONSI intensity factor 3 and the consistency findings for other laws/regulation/policy.
- Provide a map that more clearly displays the locations of base camps.

I appreciate the discussion and the opportunity to further understand your concerns and explore where we have common interests and goals. The Acting Forest Supervisor may sign the DN for this project once these instructions have been addressed. My review constitutes the final administrative determination of the Department of Agriculture; no further review from any other Forest Service or Department of Agriculture official of my written response to your objection is available [36 CFR218.11(b)(2)].

Sincerely,

SANDRA WATTS
Acting Regional Forester

Enclosure

cc: Matt Rau, Steve Hattenbach, Jay Turner, Zack Parsons, Carl Ciccarelli, Martha Garcia, Roxanne Turley, Howasta Tahiry, Blair Halbrooks

Table 3.2.1-1, which is the current baseline condition, had a minor error. Please see below in red. The error did not affect the baseline totals used for the proposed flight numbers found in Table 3.2.2-2.

Table 3.2.1-1. Baseline Conditions: 58 SOW Training in Magdalena Ranger District

HLZ/DZ/OPFOR and Aircraft Type	Average Training Days per Week/Year	Sorties per Average Training Day/Year	Total Events (Average Busy Day/Annual)	Daytime Events (Average Busy Day/Annual)	Environmental Nighttime Events (Average Busy Day/Annual)
HLZ 26					
CV-22	4/208	5/1,040	30/6,240	15/3,120	15/3,120
HH-60	6/312	8/1,716	46/10,296	23/5,148	23/5,148
UH-1N	2/104	3/208	18/1,248	9/624	9/624
Total	--	16/2,964	94/17,784	47/8,892	47/8,892
Cunningham DZ					
MC-130	0.19/10	1/10	3/30	1.5/15	1.5/15
Total (Grand totals)	--	17/2,974	97/17,814	48.5/8,907	48.5/8,907

We are able to confirm there are errors made in the calculations in Table 3.2.2-2 and corresponding text – corrections are made in red and a grand total line was also added.

Table 3.2.2-2. Proposed Action: 58 SOW Training Activities in Magdalena RD – Proposed Action

HLZ/DZ/RD and Aircraft Type	Average Training Days per Week/Year	Sorties per Average Training Day/Year	Total Events (Average Busy Day/Annual)	Daytime Events (Average Busy Day/Annual)	Environmental Nighttime Events (Average Busy Day/Annual)
Cunningham DZ (Magdalena RD)					
CV-22B	1/52	1.25/260	7.5/1,560	3.75/780	3.75/780
HH-60	0/0	0/0	0/0	0/0	0/0
MC-130	0.19/10	1/10	3/30	1.5/15	1.5/15
UH-1N	0/0	0/0	0/0	0/0	0/0
Total	--	2.25/270	10.5/1,590	5.25/795	5.25/795
HLZ 26 (Magdalena RD)					
CV-22B	1/52	1.25/260	7.5/1,560	3.75/780	3.75/780
HH-60	6/312	8/1,716	46/10,296	23/5,148	23/5,148
MC-130	0/0	0/0	0/0	0/0	0/0
UH-1N	1/52	1/52	6/312	3/156	3/156
Total	--	10.25/2,028	59.5/12,168	29.75/6,084	29.75/6,084
HLZ X (Magdalena RD)					
CV-22B	2/104	2.5/520	15/3,120	7.5/1560	7.5/1560
HH-60	0/0	0/0	0/0	0/0	0/0
MC-130	0/0	0/0	0/0	0/0	0/0
UH-1N	0/0	0/0	0/0	0/0	0/0
Total	--	2.5/520	15/3,120	7.5/1560	7.5/1560
HLZ Y (Magdalena RD)					
CV-22B	2/104	2.5/520	15/3,120	7.5/1560	7.5/1560
HH-60	0/0	0/0	0/0	0/0	0/0
MC-130	0/0	0/0	0/0	0/0	0/0
UH-1N	0/0	0/0	0/0	0/0	0/0
Total	--	2.5/520	15/3,120	7.5/1560	7.5/1560
HLZ Z (Magdalena RD)					

CV-22B	2/104	2.5/520	15/3,120	7.5/1560	7.5/1560
HH-60	0/0	0/0	0/0	0/0	0/0
MC-130	0/0	0/0	0/0	0/0	0/0
UH-1N	0/0	0/0	0/0	0/0	0/0
Total	--	2.5/520	15/3,120	7.5/1560	7.5/1560
GRAND TOTALS	--	20/3,858	115/23,118	57.5/11,559	57.5/11,559

Notes: Number of air events per sortie varies between 6 and 8, depending on the aircraft type and type or training.
DZ – drop zone
HLZ – helicopter landing zone

The number of events that would take place at Cunningham DZ would increase from 3 per average busy day to 10.5 and from 30 per average busy year to 1,590. The number of events that would take place at HLZ 26 would decrease from 94 per average busy day to 59.5 and from 17,784 per average busy year to 12,168. Each of the new HLZs would experience 2.5 air events per average busy day and 520 per average busy year.

The total events in Magdalena RD will increase from 97 per average busy day to 115 and from 17,814 per average busy year to 23,118.

We confirm that the above statement does match with Dr. Pregenzer's comments in this contention. We agree with the objector's conclusion that the increases will be 18% & 30%, respectively. However, the computation errors found in Table 3.2.2-2 were not carried forward to the noise analysis section (Chapter 3.3). The correct totals were used in the noise analysis (see Table 3.3.2-2 – yellow highlight), therefore, the impacts from the proposed action were properly addressed.

We also noted the following errors in other tables in Section 3

Table 3.2.1-2. Baseline Conditions: 58 SOW Training at HLZ 10, Mountainair Ranger District
(on page 3-13 please note this was not carried through on to Table 3.2.2-3. Proposed Action: 58 SOW Training Activities in Mountainair RD on page 3-21)

Aircraft Type	Average Training Days per Week/Year	Sorties per Average Training Day/Year	Total Events (Average Busy Day/Annual)	Daytime Events (Average Busy Day/Annual)	Environmental Nighttime Events (Average Busy Day/Annual)
CV-22B	0/0	0/0	0/0	0/0	0/0
HH-60	6/312	8/1,716	46/10,296	23/5,148	23/5,148
MC-130	0/0	0/0	0/0	0/0	0/0
UH-1N	2/104	3/208	18/1,248	9/624	9/624
Total	--	11/1,924	64/11,544	32/5,772	32/5,772

Notes: Number of air events per sortie varies between 6 and 8, depending on the aircraft type and type or training.
 DZ – drop zone
 HLZ – helicopter landing zone

Table 3.2.3-1. Alternative 1: 58 SOW Training in Magdalena Ranger District *(on page 3-22)*

HLZ/DZ/OPFOR and Aircraft Type	Average Training Days per Week/Year	Sorties per Average Training Day/Year	Total Events (Average Busy Day/Annual)	Daytime Events (Average Busy Day/Annual)	Environmental Nighttime Events (Average Busy Day/Annual)
HLZ 26					
CV-22B	4/208	5/1,040	30/6,240	15/3,120	15/3,120
HH-60	6/312	8/1,716	46/10,296	23/5,148	23/5,148
UH-1N	2/104	3/208	18/1,248	9/624	9/624
Total	--	16/2,964	94/17,784	47/8,892	47/8,892
Cunningham DZ					
MC-130	0.19/10	1/10	3/30	1.5/15	1.5/15
Total	--	17/2,974	97/17,814	48.5/8,907	48.5/8,907

Notes: Number of air events per sortie varies between 6 and 8, depending on the aircraft type and type or training.
 DZ – drop zone
 HLZ – helicopter landing zone

Table 3.2.3-2. Alternative 1: 58 SOW Training at HLZ 10, Mountainair Ranger District
(on page 3-23)

Aircraft Type	Average Training Days per Week/Year	Sorties per Average Training Day/Year	Total Events (Average Busy Day/Annual)	Daytime Events (Average Busy Day/Annual)	Environmental Nighttime Events (Average Busy Day/Annual)
CV-22B	0/0	0/0	0/0	0/0	0/0
HH-60	6/312	8/1,716	46/10,296	23/5,148	23/5,148
MC-130	0/0	0/0	0/0	0/0	0/0
UH-1N	2/104	3/208	18/1,248	9/624	9/624
Total	--	11/1,924	64/11,544	32/5,772	32/5,772

Notes: Number of air events per sortie varies between 6 and 8, depending on the aircraft type and type or training.
 DZ – drop zone
 HLZ – helicopter landing zone

Table 3.3.2-2. Proposed Action: Magdalena Ranger District HLZ and DZ Operations (on page 3-36)

	Proposed Action (HLZ 26)		Proposed Action (HLZ X, Y, Z)		Proposed Action (Cunningham DZ)	
Sorties per day	11		3		3	
Training days per year	312		104		52	
Annual sorties	12,168		3,120		1,590	
Landings per sortie ⁽¹⁾	8		8		8	
Estimated landings per year ⁽²⁾	Daytime	Nighttime	Daytime	Nighttime	Daytime	Nighttime
	6,084	6,084	1,560	1,560	795	795

Notes:

- (1) Landings per sorties assumes up to one landing every 15 mins
- (2) Operations evenly split between acoustic daytime (0700-2200) and acoustic nighttime (2200-0700)